

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

JOHN RASH

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:20-CV-224-NBB-RP

LAFAYETTE COUNTY, MISSISSIPPI

DEFENDANT

DEFENDANT'S MOTION TO EXTEND DISCOVERY DEADLINE (UNOPPOSED)

COMES NOW, Lafayette County, Mississippi, the Defendant in the above-styled and numbered cause, by and through counsel, and files its Motion to Extend the Discovery Deadline and would state as follows:

1.

This Section 1983/First Amendment action was filed on July 31, 2020 by John Rash who sought preliminary injunctive relief which was denied by the district court after hearing on August 6, 2020. Thereafter, the Plaintiff and Defendant agreed to an expedited discovery schedule (January 15, 2021), pretrial motion deadline (February 2, 2021) and trial setting (June 6, 2021) which were incorporated into the case management order entered on September 15, 2020. Since then, the parties have diligently pursued and exchanged discovery, including depositions which were last conducted on January 15, 2020. At this time, the Defendant needs until Wednesday, January 20, 2021 to complete and supplement prior discovery and disclosures. The Plaintiff does not oppose the extension.

2.

The Defendant is in need of the five day extension due to other case commitments of its counsel of record and the as yet unsuccessful efforts of counsel to obtain certain material information maintained by non-parties. The proposed extension will not affect the other deadlines set forth in the case management order.

THIS, the 19th day of January, 2021.

Respectfully submitted,

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/s/ David D. O'Donnell
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CERTIFICATE OF SERVICE

I, David D. O'Donnell, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

This the 19th day of January, 2021.

/s/ David D. O'Donnell
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